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Date: Subject: 11/16/2007 9:41 AM Venoco Lease 421

Comments on the PRC 421 Recommissioning Project.

The recommissioning of Lease 421 should not be approved. Previously, the Pier 421 oil went directly into Line 96 and onto the Marine Terminal but this proposal would send it to the Ellwood Onshore Facility. The EOF is a non-conforming use under its Recreation zoning. Any expansion of the existing operation is prohibited except for safety purposes.

Pier 421 is an old facility that experienced major storm damage several years ago, which could happen again. This is the only remaining oil processing facility remaining in the surf zone in California and should be removed.

The entire Venoco group of submissions should be considered together not piecemeal. This appears to be in violation of CEQA.

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